

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

.....X

*In re Terrorist Attacks on September 11, 2001*

03 MDL 1570 (GBD) (SN)

.....X

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying (i) Memorandum of Law of Non-Party the Federal Bureau of Investigation (“FBI”) in Support of Its Motion for a Protective Order and in Opposition to Plaintiffs’ Motions to Compel Production; (ii) Declaration of Attorney General William P. Barr, dated April 13, 2020, with attachment; (iii) Declaration of Acting Director of National Intelligence Richard Allen Grenell, dated March 25, 2020; (iv) Declaration of Jill Sanborn, Assistant Director of the FBI’s Counterterrorism Division, dated April 13, 2020, with attachment; (v) Declaration of Brian T. Gilhooly, Deputy Assistant Director of the FBI’s Counterterrorism Division, dated April 8, 2020, with attachment; and (vi) Declaration of Assistant U.S. Attorney Sarah S. Normand, dated April 13, 2020, with attachments; as well as the classified submissions lodged for the Court’s *ex parte, in camera* review, including the (vii) *Ex Parte, In Camera* Classified Memorandum of Law of Non-Party the FBI in Support of Its Motion for a Protective Order and in Opposition to Plaintiffs’ Motions to Compel Production; (viii) *Ex Parte, In Camera* Classified Declaration of Acting Director Grenell, dated March 25, 2020, with attachment; (ix) Classified *In Camera, Ex Parte* Declaration of Assistant Director Sanborn, dated April 13, 2020, with attachments; (x) Classified *In Camera, Ex Parte* Declaration of Deputy Assistant Director Gilhooly, dated April 8, 2020; and (xi) Classified *In Camera, Ex Parte* Declaration submitted by the Central Intelligence Agency, dated March 24, 2020, the FBI, by its attorney, Geoffrey S. Berman, United States Attorney for the Southern District of New

York, hereby moves this Court for a protective order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure.

Dated: April 13, 2020  
New York, New York

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

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